

EK/jlp

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	5:25-cv-00462-G
	)	
PLAZA HOTELS, LLC;	)	
STEVE KETTER;	)	
MICHAEL WILEY;	)	
OKC AIRPORT ES, LLC;	)	
ESH STRATEGIES FRANCHISE, LLC;	)	
KAJAL HOSPITALITY, LLC;	)	
JALIYAN HOSPITALITY, INC.;	)	
SUPER 8 WORLDWIDE, INC.;	)	
CHAND & SAAJ HOSPITALITY, INC.;	)	
RAMADA WORLDWIDE, INC.;	)	
YASH ENTERPRISES, INC.;	)	
HOWARD JOHNSON;	)	
INTERNATIONAL, INC.;	)	
NOOR HOTEL, LLC;	)	
AMBICA, LLC;	)	
OM, LLC;	)	
INDRA, LLC; and	)	
G6 HOSPITALITY FRANCHISING, LLC,	)	
	)	
Defendants.	)	

**NOTICE OF NON-OPPOSITION TO  
PLAINTIFF’S REQUEST FOR LEAVE TO AMEND HER COMPLAINT**

COMES NOW, the Defendant, Chand & Saaj Hospitality, Inc. (“C&S”), and gives notice to the Court that C&S does not oppose Plaintiff’s request for leave to amend her Complaint, as proposed in Doc. 58-1. C&S does not intend to waive any defenses and expressly reserves the right to raise any defense available, including by filing a motion to dismiss or other dispositive, jurisdictional or procedural motion applicable to the

amended complaint, once filed.

Respectfully submitted,

SECREST, HILL, BUTLER & SECREST

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**CERTIFICATE OF MAILING**

This is to certify that on the 13th day of June, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF Registrants:

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